

# Exhibit 38



# MI Money Transmitter License Amendment Checklist (Company)

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## CHECKLIST SECTIONS

- [General Information](#)
- [Amendments](#)

## GENERAL INFORMATION

### Instructions

When making changes to your record in NMLS, Michigan requires advance notification for some changes. See the checklist below for details.

### Uploading Agency-Specific Documents

If you are required to upload documents to NMLS for an Advance Change Notice (ACN), select “Advance Change Notice” for the document type in the NMLS Document Uploads section. If you are required to upload documents for an amendment that doesn’t require ACN, select the applicable document type in the NMLS Document Uploads section.

**Note:** Use the recommended filing naming convention found on the [Document Upload Descriptions and Examples](#).

### Helpful Resources

- [Amendments & Advance Change Notice](#)
- [Document Uploads Quick Guide](#)
- [Document Upload Descriptions and Examples](#)

### Agency Contact Information

Contact Consumer Finance Section by phone at (877) 999-6442 or send your questions via email to [difs-fin-info@michigan.gov](mailto:difs-fin-info@michigan.gov) for additional assistance.

#### For U.S. Postal Service:

Department of Insurance and Financial Services  
Consumer Finance Section  
P.O. Box 30220  
Lansing, MI 48909-7720

#### For Overnight Delivery:

Department of Insurance and Financial  
Services  
Consumer Finance Section  
530 W. Allegan St., 7th Floor  
Lansing, MI 48933

THE APPLICANT/LICENSEE IS FULLY RESPONSIBLE FOR ALL OF THE REQUIREMENTS OF THE LICENSE FOR WHICH THEY ARE APPLYING. THE AGENCY SPECIFIC REQUIREMENTS CONTAINED HEREIN ARE FOR GUIDANCE ONLY TO FACILITATE APPLICATION THROUGH NMLS. SHOULD YOU HAVE QUESTIONS, PLEASE CONSULT LEGAL COUNSEL.

## AMENDMENTS

- [Change of Legal Name](#)
  - Change of Legal Name Fee: \$50
- [Change of Main Address](#)
  - Change of Main Address Fee: \$50
- [Addition or Modification of Other Trade Name](#)
  - Addition or Modification of Other Trade Name Fee: \$50
- [Deletion of Other Trade Name](#)
  - Deletion of Other Trade Name Fee: \$50
- [Change of Legal Status](#) or Formation State
  - Legal Status or Formation State change may require new application: fees vary (will be determined by DIFS)
- [Addition, Modification, or Deletion of Affiliates/Subsidiaries](#)
- [Addition, Modification, or Deletion of Direct Owners/Executive Officers](#)
  - Direct Owners change may require ownership transfer: fees vary (will be determined by DIFS)
- [Addition, Modification, or Deletion of Indirect Owners](#)
  - Indirect Owner change may require transfer: fees vary (will be determined by DIFS)
- [Modification of Qualifying Individuals](#)
- [Change of Disclosure Question\(s\)](#)

**Note:** Information uploaded or filed in NMLS will not be viewable to the agency until the filing has been attested to and submitted through NMLS. Agency-specific requirements that should be emailed or mailed to the agency on the checklist below must be received with the appropriate checklist within five (5) business days of the electronic submission of your filing through NMLS.

NMLS ID Number	
Licensee Legal Name	

Complete	MI Money Transmitter License Change of Legal Name Amendment Items	Submitted via...
<input type="checkbox"/>	<b>Change of Legal Name:</b> Submit an ACN for a change of Legal Name through the Company Form (MU1) in NMLS. 30 Days' notice must be provided for this change.	NMLS
<input type="checkbox"/>	<b>Change of Legal Name Fee:</b> \$50 Fees collected through NMLS are NOT REFUNDABLE OR TRANSFERABLE.	NMLS (Filing submission)
<input type="checkbox"/>	<b>Electronic Surety Bond Rider:</b> Contact the surety bond producer to inform them of the change and effective date so the producer can initiate the Surety Bond Rider Process in NMLS.	Electronic Surety Bond in NMLS
<input type="checkbox"/>	<p><b>Formation Documents:</b> Formation Documents must be submitted related to this change type.</p> <p>Determine classification of licensee's legal status and submit a State certified copy of the requested applicable documentation detailed below. Original formation documents and all subsequent amendments, thereto including a list of any name changes.</p> <p>The Michigan authority to conduct business, articles of incorporation, articles of organization, or articles of partnership must be amended and confirmed by uploading evidence of the change. Contact the Michigan Corporation Division (ph. 517- 241-6470; website <a href="http://www.michigan.gov/corporations">www.michigan.gov/corporations</a>) or applicable county clerk's office.</p> <p><b>Sole Proprietor</b></p> <ul style="list-style-type: none"> <li>County assumed name filing.</li> </ul> <p><b>Unincorporated Association:</b></p> <ul style="list-style-type: none"> <li>By-Laws or constitution (including all amendments).</li> </ul> <p><b>General Partnership:</b></p> <ul style="list-style-type: none"> <li>Partnership Agreement (including all amendments).</li> </ul> <p><b>Limited Liability Partnership:</b></p> <ul style="list-style-type: none"> <li>Certificate of Limited Liability Partnership; and</li> <li>Partnership Agreement (including all amendments).</li> </ul> <p><b>Limited Partnership:</b></p> <ul style="list-style-type: none"> <li>Certificate of Limited Partnership; and</li> <li>Partnership Agreement (including all amendments).</li> </ul>	<b>Upload in NMLS:</b> under the Document Type <u>Formation Document</u> in the <i>Document Uploads</i> section of the Company Form (MU1).

Complete	MI Money Transmitter License Change of Legal Name Amendment Items	Submitted via...
	<p><b>Limited Liability Limited Partnership:</b></p> <ul style="list-style-type: none"> <li>• Certificate of Limited Liability Limited Partnership; and</li> <li>• Partnership Agreement (including all amendments).</li> </ul> <p><b>Limited Liability Company ("LLC"):</b></p> <ul style="list-style-type: none"> <li>• Articles of Organization (including all amendments);</li> <li>• Operating Agreement (including all amendments);</li> <li>• IRS Form 2553 or IRS Form 8832 if S-corp treatment elected; and</li> <li>• LLC resolution if authority not in operating agreement.</li> </ul> <p><b>Corporation:</b></p> <ul style="list-style-type: none"> <li>• Articles of Incorporation (including all amendments);</li> <li>• By-laws (including all amendments), if applicable;</li> <li>• Shareholder Agreement (including all amendments), if applicable;</li> <li>• IRS Form 2553 if S-corp treatment elected; and</li> <li>• Corporate resolution if authority to complete application not in By-Laws or Shareholder Agreement, as amended, as applicable.</li> </ul> <p><b>Not for Profit Corporation</b></p> <ul style="list-style-type: none"> <li>• Documents requested of a Corporation; and</li> <li>• Proof of nonprofit status <ul style="list-style-type: none"> <li>○ Internal Revenue Service ("IRS") 501(c)(3) designation letter; or</li> <li>○ statement from a State taxing body or the State attorney general certifying that: (i) the entity is a nonprofit organization operating within the State; and (ii) no part of the entity's net earnings may lawfully benefit any private shareholder or individual; or</li> <li>○ entity's certificate of incorporation or similar document if it clearly establishes the nonprofit status of the licensee; or</li> <li>○ Any of the three preceding items described, if that item applies to a State or national parent organization, together with a statement by the State or parent organization that the licensee is a local nonprofit affiliate.</li> </ul> </li> </ul> <p><b>Trust (Statutory)</b></p> <ul style="list-style-type: none"> <li>• Certificate of Trust; and</li> <li>• Governing instrument (all amendments).</li> </ul>	
<input type="checkbox"/>	<p><b>Return Original License:</b> Return the original license certificate that contains the Director's signature and watermark, as issued by the Department of Insurance and Financial Services. If the license certificate has been lost or misplaced, provide an attestation to that affect.</p>	<p><b>Mail to Michigan</b> Department of Insurance and Financial Services</p>

NMLS ID Number	
Licensee Legal Name	

Complete	MI Money Transmitter License Change of Main Address Amendment Items	Submitted via...
<input type="checkbox"/>	<b>Change of Main Address:</b> Submit an ACN for a change of Main (Corporate) Address through the Company Form (MU1) in NMLS. 30 Days' notice must be provided for this change.	NMLS
<input type="checkbox"/>	<b>Change of Main Address Fee:</b> \$50 Fees collected through NMLS are NOT REFUNDABLE OR TRANSFERABLE.	NMLS
<input type="checkbox"/>	<b>Return Original License:</b> Return the original license certificate that contains the Director's signature and watermark, as issued by the Department of Insurance and Financial Services. If the license certificate has been lost or misplaced, provide an attestation to that affect.	Mail to Michigan Department of Insurance and Financial Services

NMLS ID Number	
Licensee Legal Name	

Complete	MI Money Transmitter License Authorized Delegates and Branch Locations	Submitted via...
<input type="checkbox"/>	<b>Financial Statement (For addition of authorized delegates and branch location):</b> Upload most recent audited (prepared by a Certified Public Accountant) or unaudited financial statement (signed by an executive officer) and completed in accordance with Generally Accepted Accounting Principles. A licensee must have a minimum net worth of \$100,000 plus \$25,000 for each additional location or authorized delegate, up to a maximum required net worth of \$1,000,000. Financial statement form <a href="#">FIS-2053</a> is located on agency website <a href="http://www.michigan.gov/difs">www.michigan.gov/difs</a> .	NMLS
<input type="checkbox"/>	<b>Branch Location (For change in address or addition of branch location):</b> Provide an updated list of branch locations.	Mail to Michigan Department of Insurance and Financial Services

NMLS ID Number	
Licensee Legal Name	

Complete	MI Money Transmitter License Addition or Modification of Other Trade Name Amendment Items	Submitted via...
<input type="checkbox"/>	<b>Addition or Modification of Other Trade Name:</b> Submit an ACN for an addition of or change to an Other Trade Name through the Company Form (MU1) in NMLS. 30 Days' must be provided for this change.	NMLS
<input type="checkbox"/>	<b>Addition or Modification of Other Trade Name Fee:</b> \$50 Fees collected through NMLS are NOT REFUNDABLE OR TRANSFERABLE.	NMLS (Filing submission)
<input type="checkbox"/>	<b>Trade Name/Assumed Name Registration Certificates:</b> Trade Name/Assumed Name Registration Certificates must be submitted related to this change type. All assumed names must first be registered with the Michigan Corporation Division (ph. 517-241-6470; website <a href="http://www.michigan.gov/corporations">www.michigan.gov/corporations</a> ). If operating under an "Other Trade Name", upload a separate State issued and approved document for each assumed name regarding the ability to do business under that trade name.	<b>Upload in NMLS:</b> under the Document Type <u>Trade Name/Assumed Name Registration Certificates</u> in the <i>Document Uploads</i> section of the Company Form (MU1).
<input type="checkbox"/>	<b>Return Original License:</b> Return the original license certificate that contains the Director's signature and watermark, as issued by the Department of Insurance and Financial Services. If the license certificate has been lost or misplaced, provide an attestation to that affect.	<b>Mail to</b> Michigan Department of Insurance and Financial Services



<b>NMLS ID Number</b>	
<b>Licensee Legal Name</b>	

<b>Complete</b>	<b>MI Money Transmitter License Deletion of Other Trade Name Amendment Items</b>	<b>Submitted via...</b>
<input type="checkbox"/>	<b>Deletion of Other Trade Name:</b> Submit an ACN for a deletion of an Other Trade Name through the Company Form (MU1) in NMLS. 30 Days' must be provided for this change.	<b>NMLS</b>
<input type="checkbox"/>	<b>Deletion of Other Trade Name Fee:</b> \$50	<b>NMLS (Agency Fee Invoice)</b>
<input type="checkbox"/>	<b>Return Original License:</b> Return the original license certificate that contains the Director's signature and watermark, as issued by the Department of Insurance and Financial Services. If the license certificate has been lost or misplaced, provide an attestation to that affect.	<b>Mail to Michigan Department of Insurance and Financial Services</b>

NMLS ID Number	
Licensee Legal Name	

Complete	MI Money Transmitter License Change of Legal Status or Formation State Amendment Items	Submitted via...
<input type="checkbox"/>	<b>Change of Legal Status:</b> Submit an ACN for a change of Legal Status within the Company Form (MU1) in NMLS. 30 Days' must be provided for this change.	NMLS
<input type="checkbox"/>	<b>Change of Formation State:</b> Submit an ACN for a change of Formation State within the Company Form (MU1) in NMLS. 30 Days' must be provided for this change.	NMLS
<input type="checkbox"/>	<b>Change of Legal Status or Formation State Fee:</b> <ul style="list-style-type: none"> <li>Legal Status change with MI approved conversion resulting in name change, see <a href="#">Change in Legal Name Amendment</a>: \$50</li> <li>Legal Status or Formation State change without MI approved conversion, a new application is required: fees vary (will be determined by DIFS)</li> </ul> <b>Note:</b> If EIN changes, a new NMLS record and application is required.	NMLS (Agency Fee Invoice)
<input type="checkbox"/>	<b>Return Original License:</b> Return the original license certificate that contains the Director's signature and watermark, as issued by the Department of Insurance and Financial Services. If the license certificate has been lost or misplaced, provide an attestation to that affect.	Mail to Michigan Department of Insurance and Financial Services

Complete	<b>MI Money Transmitter License</b> <b>Addition, Modification, or Deletion of Affiliates/Subsidiaries</b> <b>Amendment Items</b>	Submitted via...
<input data-bbox="139 359 180 396" type="checkbox"/>	<b>Addition, Modification, or Deletion of Affiliates/Subsidiaries:</b> Submit an amendment for an addition or change in Affiliates/Subsidiaries within the Company Form (MU1) in NMLS.	<b>NMLS</b>

NMLS ID Number	
Licensee Legal Name	

Complete	MI Money Transmitter License Addition, Modification, or Deletion of Direct Owners/Executive Officers Amendment Items	Submitted via...
<input type="checkbox"/>	<b>Addition, Modification, or Deletion of Direct Owners/Executive Officers:</b> Submit an ACN for a change in Direct Owners/Executive Officers within the Company Form (MU1) in NMLS. 30 Days' notice must be provided for this change.	NMLS
<input type="checkbox"/>	<b>Addition, Modification, or Deletion of Direct Owners/Executive Officers Fee:</b> <ul style="list-style-type: none"> <li>Direct Owners change may require ownership transfer: fees vary (transfer will be determined by DIFS)</li> </ul> <b>Note:</b> No fee charged for change in Executive Officers	NMLS (Agency Fee Invoice)
Note	<b>Credit Report:</b> Credit Reports and authorizations for credit report through NMLS are not required.	N/A
Note	<b>MU2 Individual FBI Criminal Background Check Not Required Through NMLS:</b> Direct Owners and Executive Officers are NOT required to authorize a FBI criminal background check (CBC) through NMLS.	N/A
<input type="checkbox"/>	<b>Return Original License:</b> Return the original license certificate that contains the Director's signature and watermark, as issued by the Department of Insurance and Financial Services. If the license certificate has been lost or misplaced, provide an attestation to that affect. <b>Note:</b> Only returned if Direct Owners change requires ownership transfer.	Mail to Michigan Department of Insurance and Financial Services

NMLS ID Number	
Licensee Legal Name	

Complete	MI Money Transmitter License Addition, Modification, or Deletion of Indirect Owners Amendment Items	Submitted via...
<input type="checkbox"/>	<b>Addition, Modification, or Deletion of Indirect Owners:</b> Submit an ACN for a change in Indirect Owners within the Company Form (MU1) in NMLS. 30 Days' notice must be provided for this change.	NMLS
<input type="checkbox"/>	<b>Addition, Modification, or Deletion of Indirect Owners Fee:</b> <ul style="list-style-type: none"> <li>Indirect Owners change may require ownership transfer: fees vary (transfer will be determined by DIFS)</li> </ul>	NMLS (Agency Fee Invoice)
Note	<b>Credit Report:</b> Credit Reports and authorizations for credit report through NMLS are not required.	N/A
Note	<b>MU2 Individual FBI Criminal Background Check Not Required Through NMLS:</b> Owners are NOT required to authorize a FBI criminal background check (CBC) through NMLS.	N/A
<input type="checkbox"/>	<b>Return Original License:</b> Return the original license certificate that contains the Director's signature and watermark, as issued by the Department of Insurance and Financial Services. If the license certificate has been lost or misplaced, provide an attestation to that affect.  <b>Note:</b> Only returned if Indirect Owners change requires ownership transfer.	<b>Mail to</b> Michigan Department of Insurance and Financial Services

Complete	MI Money Transmitter License Modification of Qualifying Individual Amendment Items	Submitted via...
<input type="checkbox"/>	<b>Modification of Qualifying Individual:</b> Submit an amendment for a change in Qualifying Individuals within the Company Form (MU1) in NMLS.	<b>NMLS</b>
Note	<b>Credit Report:</b> Credit Reports and authorizations for credit report through NMLS are not required.	<b>N/A</b>
Note	<b>MU2 Individual FBI Criminal Background Check Not Required Through NMLS:</b> Qualifying Individuals are NOT required to authorize a FBI criminal background check (CBC) through NMLS.	<b>N/A</b>

Complete	MI Money Transmitter License Change of Disclosure Question(s) Amendment Items	Submitted via...
<input type="checkbox"/>	<b>Change of Disclosure Question(s):</b> Submit an amendment for a change to Disclosure Question response(s) through the Company Form (MU1) in NMLS.	<b>NMLS</b>
<input type="checkbox"/>	<b>Changing a Response from No to Yes:</b> Provide a complete and detailed explanation and document upload for each response that changes from “No” to “Yes” for company or each control person. See the <a href="#">Company Disclosure Explanations Quick Guide</a> for instructions.	<b>Upload in NMLS</b> in the <i>Disclosure Explanations</i> section of the Company Form (MU1) or Individual Form (MU2).
<input type="checkbox"/>	<b>Changing a Response from Yes to No:</b> When changing a Disclosure Question response from Yes to No, you will be required to remove the question from the associated Disclosure Explanation and provide an Amendment Reason. You may select “Add Explanation for “No” Responses” and provide an explanation for each response that changes from “Yes” to “No” for company or each control person. You must also upload a document (PDF) related to the explanation. See the <a href="#">Company Disclosure Explanations Quick Guide</a> for instructions.	<b>NMLS</b>